

**IN THE UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF ALABAMA  
SOUTHERN DIVISION**

<b>UNITED STATES OF AMERICA</b>	)	
	)	
<b>V.</b>	)	<b>CASE NO: 1:07-CR-60-WKW</b>
	)	
<b>JAMES ALLAN GIBSON</b>	)	

**UNOPPOSED MOTION TO RESCHEDULE HEARING**

**NOW COMES** the Defendant, by and through the undersigned counsel and respectfully moves this Court to reschedule the hearing on the motion to revoke pretrial release. That hearing is presently set for July 20, 2007 at 2:00 p.m. Defendant respectfully requests that it be reset for either Thursday or Friday, July 26 or 27, 2007, based on the following:

1. Counsel for the prosecution does not oppose this motion.
2. Counsel for the prosecution and the defense are presently discussing a possible proposal for resolution of this matter, which would involve Mr. Gibson's placement in a residential drug treatment facility.
3. The parties have not yet agreed on a proposal, but it is the defense intent to request that Mr. Gibson be assigned to a bed that will be available at the Fellowship House program in Birmingham, as of Monday, July 30. The defense is not proposing that Mr. Gibson be released or moved prior to that time.
4. Both parties require additional time, in order to continue discussion of this matter.

**WHEREFORE**, defendant respectfully requests that this Motion be granted.

Respectfully submitted,

**s/Christine A. Freeman**  
**CHRISTINE A. FREEMAN**  
**TN BAR NO.: 11892**  
Attorney for James Gibson  
Federal Defenders  
Middle District of Alabama  
201 Monroe Street, Suite 407  
Montgomery, AL 36104  
TEL: (334) 834-2099  
FAX: (334) 834-0353  
E-Mail: [Christine.Freeman@fd.org](mailto:Christine.Freeman@fd.org)

**CERTIFICATE OF SERVICE**

I hereby certify that on July 20, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following: Assistant United States Attorney, 131 Clayton Street, Montgomery, AL 36101.

**s/Christine A. Freeman**  
**CHRISTINE A. FREEMAN**  
**TN BAR NO.: 11892**  
Attorney for James Gibson  
Federal Defenders  
Middle District of Alabama  
201 Monroe Street, Suite 407  
Montgomery, AL 36104  
TEL: (334) 834-2099  
FAX: (334) 834-0353